

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
Successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**JOINDER OF POPE MCGLAMRY IN MOTION BY
THE LOCKS LAW FIRM FOR APPOINTMENT OF
ADMINISTRATIVE CLASS COUNSEL AND FOR A HEARING**

The Locks Law Firm filed a Motion on March 20, 2018 (Doc. 9786) seeking various relief including a hearing on failures with respect to Claims Processing. Pope McGlamry, Kilpatrick, Morrison & Norwood, P.C. ("Pope McGlamry"), an original member of the Court-appointed Plaintiffs' Steering Committee, joins in

No. 2:12-md-02323-AB
MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

the request on behalf of its clients for an appointment of administrative class counsel and for a hearing to correct failures in Settlement implementation.

Pope McGlamry was one of the firms that originated this litigation. We represent more than 400 registered players. We have filed 30 pre-effective date claims. The implementation of the Settlement shows that the terms of the Settlement Agreement are not being applied properly and are often applied in a way that prejudices the Class and benefits the NFL. We concur with the list set forth in the filed Memorandum of the Locks Law Firm (Doc. 9786) at pages 6-7.

In addition, on information and belief, there may be other amendments and rules created by the NFL and others of which the Class is not aware and for which the Class never received notice. Any new amendment or rule that may adversely affect player claims, particularly in the context of pre-effective date claims subject to the less stringent review standard of Section 6.4(b), should be subject to the review and consideration of all Class Counsel who actually represent retired players and have submitted pre-effective date claims on their behalf. Such new rules also should be reviewed by the Court as well, possibly in the context of a hearing, to determine whether the new amendment or rule prejudices player/claimants and benefits the NFL.

Pope McGlamry respectfully requests that the Court appoint Administrative Class Counsel and hold a hearing on implementation failures to correct, among other things, failures identified in the Locks Law Firm Memorandum.

Dated: March 26, 2018.

Respectfully submitted,

POPE, McGLAMRY, KILPATRICK,
MORRISON & NORWOOD, P.C.

/s/ Michael L. McGlamry
Michael L. McGlamry
Georgia Bar No. 492515
3391 Peachtree Road, NE, Suite 300
P.O. Box 191625 (31119-1625)
Atlanta, GA 30326
Ph: (404) 523-7706
Fax: (404) 524-1648
efile@pmkm.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on all counsel of record by the Court's ECF system.

Dated: March 26, 2018

POPE, McGlamry, Kilpatrick,
Morrison & Norwood, P.C.

/s/Michael L. McGlamry
Michael L. McGlamry
Georgia Bar No. 492515